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JM-5630\_\_\_\_\_

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	)	
	)	Case No. 16-12009(JKS)
DENISE STANFORD-BELCHER	)	
	)	Chapter 13
	)	
	)	Hearing date: 4-14-16
	)	
	)	
	)	
	)	<b><u>OBJECTION TO CONFIRMATION</u></b>

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Ford Motor Credit Company LLC ("Ford Credit"), a secured creditor of the Debtor, objects to the Debtor's plan for the following reasons:

- a. The plan is silent as to Ford Credit. The plan should be revised to state that Ford Credit will retain its lien on the vehicle after confirmation, is being paid directly by the debtor and is unaffected by the plan.
- b. The remaining term of the retail installment contract encumbering the vehicle owned by the debtor exceeds the length of the plan. The plan should also state that if Ford Credit's secured claim has not been completely paid in full at the conclusion of the plan, debtor's obligation with Ford Credit will not be discharged.

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c. Ford Credit requests that the debtor provide it with proof of insurance on the vehicle as required by 11 U.S.C.

1326(a)(4).

/s/ John R. Morton, Jr.

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John R. Morton, Jr., attorney for  
Ford Motor Credit Company LLC

Date: 3-9-16